

PERSONAL DATA PROTECTION POLICY OF "TALAR FOODS" LTD.

General provisions

Art. 1 (1) In connection with the provision of its services and execution of its activities "TALAR FOODS Ltd. as a controller is processing the personal data of natural persons ("Data subjects") in compliance with the rules and principles foreseen in this Personal Data Protection Policy ("The Policy") of "TALAR FOODS" Ltd.

(2) The seat and registered address of "TALAR FOODS" Ltd. is: BULGARIA, Sofia (capitol) District, 1309 Sofia, Ilinden area, 15 DIMITAR PETKOV Blvd., tel. 02/996 45 50, electronic mail address: info@talarfoods.com, VAT No. BG130146503

Responsible Official for Data Protection

Art. 2 Any data subject may address all requests and inquiries related to exercising its personal data protection rights to the designated official.

(1) The coordinates of the Responsible Official for Data Protection of "TALAR FOODS" Ltd. are:

Name: Teodora Ranova

Electronic mail address: t.ranova@talarfoods.com

Correspondence address: Sofia, Geo Milev residential quarter, 58A Kosta Lulchev Str.

Contact phone: +359 877 660 538

Data subjects

Art. 3 "TALAR FOODS" Ltd. has the right to collect and process information concerning the following categories of natural persons (Data subjects):

- 1.** Customers - natural persons;
- 2.** Legal representative of the counterparty;
- 3.** Proxies;
- 4.** Natural persons acting as contact persons of contracts concluded with "TALAR FOODS" Ltd.;
- 5.** Other persons different from the above and entering in contact with "TALAR FOODS" Ltd. or making direct or indirect claims to "TALAR FOODS" Ltd.;
- 6.** Representatives of regulatory bodies;
- 7.** Auditors;
- 8.** Commissioners;
- 9.** Sellers and buyers of property/commercial outlet;
- 10.** third parties in their quality of witnesses or officials in relation to actions pertaining to "TALAR FOODS" Ltd. pursuant to licensing and legal obligations of the company.

Categories of personal data

Art. 4 The information (categories of personal data) which "TALAR FOODS" Ltd. is processing concerning the Data subjects in compliance with this Policy, may include:

- Identification data: Names as per identity document; UCN (Unified Civil Number) / PNA (Personal Number of Alien) / Service number / BULSTAT number (for natural persons); Date of birth; Signature;
- Contact data: telephone numbers; fax numbers; electronic mail addresses; physical correspondence addresses; other contact/correspondence data provided by the Data subject;

- Official identity: telephone/fax numbers; Position;
- Social identity: Citizenship; data on workplace, certificates, education (academic degree); references; continuity of employment;
- Video recording upon visit to a secure site;
- Information concerning legal disputes and litigations for elaboration of legal opinions and legality check, as well as legal representation before the judiciary/private and state enforcement agents, public notaries, etc.;
- Additional information concerning Partner Representatives: Names, UCN/PNA; telephone numbers; electronic mail addresses; certificates; invoice numbers, outstanding amounts, requests, declarations; work position; workplace; quality (type of legal representative, proxy, employee, partner in unincorporated company); changes and history of changes in legal representation; power of attorney; information about representative power; information about withdrawal or expiry of power of attorney, agreements for companies under the Law on Obligations and Contracts, information about the owners (if the latter is a legal person or unincorporated company) - for instance, information about partners/shareholders, number and type of shares owned, and other similar information;
- Contractual and financial information: bank accounts; contract and number and date of conclusion of contract; information about and dates of modification and termination of contract; names, telephone, electronic mail, client/subscriber number; numbers and contents of invoices; information about origin, character and amount of debts (including interests); payments made; information and history of faulty transfers; information about rescheduled payments; information about related entities and unpaid debts of related entities; discharged debts; information about paid bank guarantees or sums to the benefit of "TALAR FOODS" Ltd. (amount, purpose, date of payment and other similar); information about insurance; education; certificates and references; copyrights;
- Data on health condition - processing is necessary for the purpose of fulfilling the obligations and exercising the special rights of the controller or data subject pursuant to the health protection legislation, food safety and hygiene insofar as allowed by the Community law or the legislation of a Member State, or in compliance with a collective agreement in compliance with the legislation of a Member State, in which appropriate guarantees are foreseen for the basic rights and interests of the data subject;
- Information about submitted complaints, petitions, requests and signals (including in free text format) and about other correspondence with "TALAR FOODS" Ltd., including information about its processing and the status and final result of processing them;
- Other information and documents: Any other information and documents (declarations; statements; joint activity agreements; lists; inventories; schedules and certificates; applications, protocols; orders, certificates, declarations and other acts of competent bodies; contracts (including preliminary contracts) which Data Subjects, competent state bodies or third parties provide to "TALAR FOODS" Ltd. or which are correspondingly generated in the pre-incorporation process and/or in the framework of conclusion, amendment, execution and termination of contracts with a Data Subject.

Purposes of personal data processing

Art. 6 (1) "TALAR FOODS" Ltd. collects, uses and otherwise processes the information under Art. 5 and Art. 6 for the purposes envisaged in this Policy which, depending on the legal basis for processing thereof may be:

1. Purposes related to compliance with legal obligations of "TALAR FOODS" Ltd.; and/or
2. Purposes related to and/or necessary for execution of contracts concluded with "TALAR FOODS" Ltd. or necessary for taking steps requested by the Data Subject before conclusion of contract; and/or
3. Purposes of the legitimate interest of "TALAR FOODS" Ltd. or that of third parties;
4. Purposes for which the Data Subject has agreed their data to be processed.

(2) Personal data processing by "TALAR FOODS" Ltd. may be done for the same purposes simultaneously on more than one of the above-mentioned legal grounds.

Art. 7 The purposes for personal data processing by "TALAR FOODS" Ltd. related to compliance with legal obligations include:

1. Acceptance, servicing and management of the process of servicing signals, complaints, applications for services, requests, etc., as well as reclamations and commercial guarantees (if applicable), including elaboration of responses thereof or legality checks;
2. Activities related to accounting and reporting received payments under contracts concluded with "TALAR FOODS" Ltd. pursuant to the legislation in force (tax and accounting legislation, etc.);
3. Activities related to ensuring food safety and hygiene;
4. Safeguarding the property of "TALAR FOODS" Ltd. and access control;
5. Activities related to ensuring and controlling the quality of related audits, staff training and validation of production capacities, equipment, systems and processes; cleaning and sampling, as well as any and all secondary documents resulting of such activity;
6. Activities related to calibration of measurement equipment and instruments;
7. Activities related to fire safety and control of health conditions, as well as investigation of accidents and disasters in the enterprise;
8. Activities related to the legally established norms for technical servicing of equipment and machinery in the production process;
9. Collection of debts owed to "TALAR FOODS" Ltd., including by assignment to third parties;
10. Other activities related to compliance with legal obligations (taxation, accounting regulatory, licensing, judicial, etc.) of "TALAR FOODS" Ltd. and pertaining to provision/reporting of information to competent state and judicial bodies, as well as assisting with inspections by competent bodies;
11. Activities related to pest control.

Art. 8 The purposes of personal data processing, related to and/or necessary for execution of contracts or necessary for taking steps requested by the Data Subject before conclusion of contract with "TALAR FOODS" Ltd., include:

1. Establishing relationship with Data Subjects;
2. Conclusion, amendment, execution and termination of preliminary contract and contracts with Data Subjects, and sub-activities related thereto;
- Receiving, planning, placement and ensuring production orders;
 - All purchase activities, for instance - delivery of materials and services;
 - All sales activities;
- Logistics - transport, forwarding, planning.
 3. Rescheduling/delaying payments.
 4. Administration and management of services provided by "TALAR FOODS" Ltd. and servicing Data Subjects, including provision of on-line services.
 5. Communicating with Data Subjects concerning the conclusion, amendment and execution of contracts and in connection with the services provided. Accountability, recording, maintenance of registers and archiving of communication carried out.
 6. Checks pursuant to complaints and signals concerning the services provided.
 7. Processing and collection of payments owed by Data Subjects for services provided.
 8. Reimbursement of faulty transfers of amounts, collaterals and similar.
 9. Carrying out checks for consumption.
 10. Quality management and control of the services provided by "TALAR FOODS" Ltd.

Art. 9 The purposes of processing personal data necessary for the legitimate interests of "TALAR FOODS" Ltd. or of third parties include:

1. Legitimate interest - (1.1.) exercising and protection of the legal rights and interests of "TALAR FOODS" Ltd.; and (1.2.) assistance for exercising and protection of the legal rights and interests of Data Subjects; of persons processing personal data on behalf of "TALAR FOODS" Ltd. and of commercial partners of "TALAR FOODS" Ltd.:
 - establishment, exercising or protection of legal claims of persons indicated above under item (1.1.) and item (1.2.), including before the judiciary, inter alia lodging of claims, signals and similar actions before the competent state and judiciary bodies;
 - elaboration of legal opinions, legality check, legal representation before the judiciary/private and state enforcement agents, public notaries, etc.;
 - Assignment to third parties of actions for collection of debts owed;
 - Transfer (cession) to third parties of debts owed to "TALAR FOODS" Ltd.;
 - Activities related to administration and maintenance of received complaints, signals, requests, etc.;
 - Sending of notary letters of invitation;
 - Activities related to the processing of received orders.
2. Legitimate interest - prevention, reduction of and protection against loss:
 - Loss management including, but not limited to carrying out checks, corrections, losses, video surveillance.
3. Activities related to inspection of commercial outlets and delivery of instructions; Legitimate interest - maintenance of licenses provided to "TALAR FOODS" Ltd.:
 - Activities related to performance of assumed licensing obligations.
4. Legitimate interest - analysis and planning of the policy of "TALAR FOODS" Ltd. pertaining to relationships with Data Subjects and increasing service quality:
 - Analysis of debts owed to "TALAR FOODS" Ltd. with the purpose of limiting bad debts;

- Analysis of Data Subjects' satisfaction and planning of actions for its increase; activities related to customer retention;
 - Receiving, processing and elaboration of responses to applications and requests by Data Subjects not related to complaints from the services used by a Data Subject;
 - Control, analysis and optimization of the business processes for improving the quality of services provided to Data Subjects.
- 5. Legitimate interest - Internal accountability:**
- Management and archiving of data submitted by "Azira Food Holding" JSC to "TALAR FOODS" Ltd. and vice versa, which is necessary for establishment of the debts owed by the Data Subject;
 - Activities related to supplier assessment and maintenance of a register of selected suppliers;
 - Reports and accounts related to the overall performance of the company.

Art. 10 Purposes for which the Data Subject has agreed their data to be processed:

1. For establishing follow-up contact for needs research, analysis and prediction of preferences;
2. For direct marketing of preferential offers, products and services provided by "TALAR FOODS" Ltd.

Provision of personal data and consequences of refusal to provide it to "TALAR FOODS" Ltd.

Art. 11 (1) "TALAR FOODS" Ltd. clearly marks on all its stationery forms of applications, requests, protocols and other forms (electronic and paper) whether the indication/provision of the relevant data and/or documents is a compulsory or contractual requirement, or a requirement necessary for conclusion of contract.

(2) In case additional clarifications are needed each Data Subject may request such from t.ranova@talarfoods.com , phone 0877660538, directly to RODP of "TALAR FOODS" Ltd.

(3) Refusal to provide data and documents indicated as compulsory may represent an insuperable obstacle before conclusion of contract with "TALAR FOODS" Ltd., before provision of a service by "TALAR FOODS" Ltd., before the satisfaction and performance of submitted requests, applications, signals, etc., thus waiving the responsibility of "TALAR FOODS" Ltd. for non-performance.

(4) The refusal to provide, or provision of false data and documents may lead to the impossibility to provide the relevant services or products, or to suspension of the access to services or products provided by "TALAR FOODS" Ltd.

(5) Data subjects should not provide "TALAR FOODS" Ltd. with any special categories of data as defined in Art. 9 and Art. 10 of the Regulation (namely: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health condition (apart from the exceptions laid out in Article 4 of this Policy) or data concerning a natural person's sex life or sexual orientation; and personal data relating to criminal convictions and offences or related security measures).

Other sources of personal data

Art. 12 In certain cases the personal data processed by "TALAR FOODS" Ltd. are not collected or received directly from the Data Subject they pertain to, but from third parties such as:

1. Customer or Customer Representative different from the Data Subject;
2. Official public registries (such as Commercial Register, Property Register, etc.);
3. Control bodies;
4. State and municipal bodies;
5. Witnesses;
6. Commercial partners and subcontractors of "TALAR FOODS" Ltd. ;
7. Companies from the group of "Azira Food Holding" JSC.

Processing of information about the Data Subject by third parties processing personal data

Art. 13 (1) For the purposes laid out in this Policy and the General Provisions, "TALAR FOODS" Ltd. may subcontract activities related to processing the personal data of Data Subjects to third parties - personal data processors, in compliance and within the framework of requirements of the Regulation and other applicable rules on personal data protection.

(2) When the personal data pertaining to Data Subjects are disclosed to and processed by personal data processors, this will happen only to the extent and volume necessary to perform the tasks appointed to them by "TALAR FOODS" Ltd.

(3) The personal data processors act on behalf of "TALAR FOODS" Ltd. and are obliged to process the personal data solely with strict adherence to the instructions of "TALAR FOODS" Ltd. whereby they do not have the right to use or otherwise process information about the Data Subjects for purposes other than those laid out in this Policy.

Categories of recipients of personal data

Art. 14. The employees of "TALAR FOODS" Ltd. working under a contract with the company and bound by a Confidentiality Declaration are the recipients of personal data and have access thereto.

Art. 15 "TALAR FOODS" Ltd. is obliged not to disclose personal data about the Data Subject, about the requested or used by the Data Subject services, and not to provide the data collected to third parties, except in case when:

1. this is necessary for execution of a legal obligation of "TALAR FOODS" Ltd. to:
 - the competent State and municipal bodies;
 - the Bulgarian Chamber of Commerce and Industry;
 - the Bulgarian Food Safety Agency;
 - the Bulgarian Stock Exchange;
 - Occupational health service / Medical establishment;
2. this is expressly stipulated in the Policy:
 - Personal data processors;
 - Companies from the group of "Azira Food Holding" JSC;
 - Recipients of transferred debts owed to "TALAR FOODS" Ltd. (cessioners);
 - Subcontractors of services provided by "TALAR FOODS" Ltd.
3. this is necessary for conclusion, amendment, execution or termination of contracts:
 - Banks and providers of payment services (for example for the purposes of payments made between "TALAR FOODS" Ltd. and Data Subjects);
 - Providers of accounting services;
 - Postal operators;
 - Notaries;

- Licensed translation agencies;
 - Insurance companies;
 - External trainers;
 - Event organization companies;
 - Commercial partners of "TALAR FOODS" Ltd. ;
- 4.** The Data Subject has granted its express consent:
- Commercial partners of "TALAR FOODS" Ltd.;
 - Companies from the group of "Azira Food Holding" JSC;
 - Other parties expressly envisaged in the relevant consent.
- 5.** For protection of the rights or legitimate interests of "TALAR FOODS" Ltd., of third parties or of the Data Subject:
- a. State and judiciary bodies;
 - b. Private and state enforcement agents;
 - c. Lawyers;
 - d. Debt collectors;
 - e. Auditors;
 - f. Notaries;
 - g. Consultants;
 - h. Security companies;
 - i. Providers of services related to information society (IT services);
 - j. Experts appointed by the court and other similar persons.
- 6.** in other cases stipulated by law.

Period of storage of information

Art. 16 (1) "TALAR FOODS" Ltd. may process and store information about the Data Subject until achievement of the relevant purposes. In the cases of a concluded contract personal data may be processed until the contract/order is effective and for further 11 (eleven) years after its termination pursuant to the requirements of accounting legislation.

(2) "TALAR FOODS" Ltd. in compliance with its internal rules and the applicable legislation, shall have the right to process and store the information about the Data Subject in the following periods:

- 1.** The personal data of Data Subjects related to and/or contained in documents/data carriers, for which there are legally established periods of storage (accounting documents; documents, information and other records related to taxation control, etc; documents related to ensuring occupational safety and health; documents related to ensuring food safety and hygiene; documents related to consumer protection; documents related to storage related to video surveillance and access control) shall be stored for the periods stipulated in the legislation in force, unless a longer storage period is envisaged for the relevant documents/data carriers;
- 2.** For a period of 5 (five) years shall be stored the data related to and/or contained in documentation pertaining to:
 - Correspondence and documents related to orders and information about debts owed to "TALAR FOODS" Ltd.
- 3.** For a period of 3 (three) years shall be stored the data related to and/or contained in documentation pertaining to:
 - purchasing - register of approved suppliers;

- negotiation with customers and suppliers - client cards, protocols for certification of goods unfit for sale, register of approved suppliers;
 - Quality assurance - reports, statements, protocols, checkups, registers, declarations and logs.
4. For a period of 1 (one) year shall be stored the data related to and/or contained in documentation pertaining to:
- Consent granted by the Data Subject.

(2) If pursuant to a law or other legislative act (including, but not limited to legislative acts in the area of taxation and accounting legislation) it is required that the storage of relevant information and/or relevant documents or other data carriers must last for a period longer than that indicated in Paragraph 2, the longer, legally stipulated period shall be applied to their storage.

Rights pertaining to personal data

Art. 17 (1) In connection with the processing of personal data related thereto, each Data Subject is entitled to the following rights granted by the Regulation:

1. Right of information - to receive information about the processing of his or her personal data by "TALAR FOODS" Ltd.
2. Right of access:
 - to obtain confirmation as to whether or not personal data concerning him or her are being processed;
 - to obtain access to the processed personal data and the detailed information concerning the processing and his or her rights pursuant to the Regulation.
3. Right of rectification - to obtain rectification of inaccurate personal data or to have incomplete personal data completed.
4. Right of erasure - to obtain the erasure of his or her personal data if the legal grounds set forth in the Regulation exist.
5. Right of restriction of processing of personal data - to request from "TALAR FOODS" Ltd. restriction of processing of his or her personal data within the limits provided by the Regulation, if the legal grounds set forth in the latter exist.
6. Notification of third parties - the right to request from "TALAR FOODS" Ltd. to notify the third parties to which his or her personal data have been disclosed, about any rectification, erasure or restriction of processing of his or her personal data, except when it proves impossible or involves disproportionate effort on behalf of "TALAR FOODS" Ltd.
7. Right to data portability - to receive the personal data concerning him or her, which he or she has provided to "TALAR FOODS" Ltd., in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the "TALAR FOODS" Ltd.

The right to data portability shall apply when the following two conditions are fulfilled simultaneously:

- the processing is based on consent or a contractual obligation; and
- the processing is based on automated means.

The data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The right to data portability may be exercised in a manner which does not adversely affect the rights and freedoms of other persons.

- 8.** Rights concerning automated individual decision-making, including profiling - the right not to be subject to a decision based solely on automated processing (i.e. processing without human interaction), including profiling within the meaning of the Regulation, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the grounds stipulated in the Regulation exist and suitable measures are implemented to safeguard the Data Subject's rights and freedoms and legitimate interests. Such safeguards are at least the right to obtain human intervention on the part of "TALAR FOODS" Ltd., to express his or her point of view and to contest the decision

If such decision-making, including profiling exists pertaining to the Data Subject, for each case the Data Subject shall have the right and shall obtain from "TALAR FOODS" Ltd. separately meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject, as well as the manner of exercising the rights under this item.

- 9.** Right to withdraw consent for processing - where processing of personal data is based solely on consent given by the Data Subject, the latter may withdraw consent at any time. Such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

Right to object

Art. 18 (1) The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling based on the provisions of the Regulation, which is based on performance of a task carried out in the public interest or in the exercise of official authority, or the legitimate interests pursued by "TALAR FOODS" Ltd. or by a third party.

(2) In such cases "TALAR FOODS" Ltd. shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

Art. 19 (1) The Data Subject may exercise his or her rights related to personal data protection by sending a relevant written request to the RODP of "TALAR FOODS" Ltd. - submitted personally by the Data Subject to "TALAR FOODS" Ltd. or through a notarized request sent by mail.

(2) The data subject may exercise the rights related to his or her personal data in person or through a duly authorized proxy (with notarized Power of Attorney).

Right to lodge a complaint with a supervisory authority

Art. 20 Each Data Subject has the right to lodge a complaint with a personal data protection supervisory authority, more specifically in a Member State (of EU/EEA) of his or her habitual residence, workplace or place of alleged infringement, should he or she deem that the processing of his or her personal data infringes the provisions of the Regulation or of other applicable personal data protection requirements.

Supervisory authority in the Republic of Bulgaria

Art. 21 The Supervisory authority in the Republic of Bulgaria is:

Commission for Personal Data Protection
Address: 1592 Sofia, 2 "Prof. Tsvetan Lazarov" Blvd.
Website: <https://www.cpdp.bg/>.

Restrictions of rights

Art. 22 The scope of the rights of Data Subjects and the obligations of "TALAR FOODS" Ltd. in connection with these rights may be restricted by way of a legislative measure based on EU law or the law of a Member State applicable to "TALAR FOODS" Ltd.

Clarifications and additional information

Art. 23 The Data Subject may receive clarifications concerning the contents, grounds for emergence, manner of exercising the rights under this Policy, as well as any additional information concerning his or her rights related to personal data processing by "TALAR FOODS" Ltd. from the DPO.

Conditions applicable to the consent of a person under the age of 18 in relation to information society services

Art. 24 In the cases where the grounds for processing of personal data of a Data Subject is his or her express consent and such processing is in relation to the offer of information society services directly to a Data Subject under the age of 18, such processing shall be done only if and to the extent that consent is given or authorised by the holder of parental responsibility over the Data Subject.

This Personal Data Protection Policy is constituted by "TALAR FOODS" Ltd. in its quality of personal data controller with regard to fulfilling its obligations for provision of information to the Data Subjects pursuant to Art. 13 and Art. 14. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

This Personal Data Protection Policy is approved by the Manager of "TALAR FOODS" Ltd. and is in force since 25/05/2018.